

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

FABRICE TOURRE,

Defendant.

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: 10 Civ. 3229 (KBF)
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: ECF Case
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DECLARATION OF BRIDGET M. FITZPATRICK

I, BRIDGET M. FITZPATRICK, an attorney, declare and state as follows:

1. I am a member in good standing of the bar of the District of Columbia, and am employed as an Assistant Chief Litigation Counsel in the Division of Enforcement of the Securities and Exchange Commission ("SEC") at its Washington, D.C. headquarters. I act as a litigation and trial attorney on behalf of the SEC in civil enforcement actions filed against persons and entities alleged to have committed violations of the United States securities laws. I serve as one of the attorneys for the SEC in *Securities and Exchange Commission v. Fabrice Tourre*, Case No. 10 Civ. 3229 (KBF), in the United States District Court for the Southern District of New York. I make this Declaration in support of the SEC's Reply Memorandum In Further Support Of Its Motion In Limine Pursuant To Federal Rule Of Evidence 611.

2. Attached as Exhibit 1 is a true and correct copy of an excerpt from the October 26, 2009 Wells Submission of Fabrice Tourre.

3. Attached as Exhibit 2 is a true and correct copy of the lists of the attorneys of record in *SEC v. Stoker*, No. 11-CV-07388 (S.D.N.Y.) and *SEC v. Citigroup*, No. 11-CV-07387 (S.D.N.Y.).


4. Attached as Exhibit 3 is a true and correct copy of the Consent of Defendant Citigroup Global Markets, Inc., filed Oct. 19, 2011 in *SEC v. Citigroup*, No. 11-CV-07387 (S.D.N.Y.).

5. Attached as Exhibit 4 is a true and correct copy of the Consolidated Class Action Complaint, filed July 25, 2011, in *In re Goldman Sachs Group, Inc. Securities Litigation*, No. 10-CV-03461 (S.D.N.Y.).

6. Attached as Exhibit 5 is a true and correct copy of the Second Amended Complaint, filed January 31, 2013 in *ACA Financial Guaranty Corp. v. Goldman, Sachs & Co.*, No. 650027/2011 (N.Y. Sup. Ct.).

7. Attached as Exhibit 6 is a true and correct copy of Defendant Fabrice Tourre's Objections And Responses To Plaintiff's Second Set Of Requests For Production, dated November 24, 2010.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 17, 2013.



Bridget M. Fitzpatrick